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March 20, 2020

Hon. Lewis A. Kaplan Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: LawHQ, LLC et al v. Dopico et al., No. 1:20-cv-00616

Dear Judge Kaplan:

I represent the plaintiffs in this case. An initial pretrial conference is currently scheduled for March 25, 2020, at 3 p.m. The plaintiffs respectfully move to adjourn the conference until after April 27, 2020. Counsel for the defendants consents to this motion.

In its Order re Scheduling and Initial Pretrial Conference, this Court ordered that an initial conference in this case would be held on February 26, 2020. Plaintiffs' counsel moved on February 24 to adjourn the conference for thirty days on the ground that the defendants had not yet been served and that the plaintiffs intended to request waiver of service. The Court notified counsel by phone on February 25 that the conference was adjourned until March 25.

On February 26, the plaintiffs sent all of the defendant state officials a written request for waiver of service under Federal Rule of Civil Procedure 4(d)(1). All the defendants have now agreed to waive service, making their response due on April 27, 2020. The defendants have asked that the conference be adjourned until after that date. The requested adjournment will give the defendants an opportunity to enter an appearance and develop their response to the complaint before the conference date.

Respectfully,

Greg Beck

Counsel for plaintiffs

cc: Elizabeth Figueira, Assistant Attorney General Va Counsel for defendants

at 9:30 um

MEMO

3/23/2020